

**Sharkey, John**

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**From:** Mike.Piechowski@deq.idaho.gov  
**Sent:** Thursday, March 29, 2007 5:54 PM  
**To:** Sharkey, John  
**Cc:** Neace, Thomas; Grimm, Angie  
**Subject:** March 30th Well Construction Rules Draft

Mr. Sharkey,

I would like to thank you, IDWR, and the members of the drilling community for having the opportunity to attend the rule making committee meetings over the last several months and I appreciate the language you have drafted in Rule 311 regarding requirements for Public Water Supply Wells. Unfortunately, I will not be able to attend the scheduled March 30<sup>th</sup> meeting and I would like to offer a comment on the current draft.

One item I remember being contentious in an earlier meeting still causes me concern in the current draft, that being the requirements for well casing wall thickness of Rule 31, Standards for Well Casing and Liners. You may recall that DEQ recently completed a negotiated rulemaking for IDAPA 58.01.08 Idaho Rules for Public Drinking Water Systems. Those rules were approved by the current legislature and will become effective upon legislature adjournment. I mention this because the issue of casing wall thickness was also discussed during those Drinking Water Rule negotiations. The consensus among the engineers involved in the committee was that the requirements in Table I of the 2003 Edition of Recommended Standards for Water Works, commonly referred to as "Ten States Standards" were desirable and acceptable requirements for public drinking water wells in Idaho. Table I was subsequently incorporated into the new Drinking Water Rules as Section 900, Table 3.

Please review Table 3 at your earliest convenience. You will note that the minimum thickness for ANY size well is 0.28 inches; that being the required wall thickness for a 6 inch diameter well. You will see that the required wall thickness gradually increases to 0.50 inches for 22 to 36 inch diameter wells, regardless of depth.

As you know, the required wall thickness in the current draft of the Well Construction Standards Rules allows 0.25 inch wall thickness for any diameter wells, even those up to 30 inches, depending on depth of the well. I feel that allowing 30 inch diameter wells up to 300 feet in depth to be constructed of 0.25 in wall thickness not only threatens the integrity and strength of the well which could cause construction and maintenance problems, it also most likely shortens the useful life of the well from corrosion and wearing of the casing from sand and other particulates. I remember the presentation at one of the earlier meetings showing aquifer commingling caused by holes corroded or worn through the walls. As you know, aquifer commingling is not very protective of groundwater resources, and groundwater protection is something DEQ is very interested in, as is IDWR I would guess.

A similar 30 inch well constructed for a public water supply well would have to be constructed of 0.50 inch wall thickness, regardless of depth. This is TWICE the required thickness in your current draft for 30 inch wells up to 300 feet deep. I also note that the maximum wall thickness in your draft is 0.375 inch, again far short of 0.50. While I like the idea of allowing lesser wall thicknesses for shallower wells in your draft, I feel that the overall thicknesses presented in Rule 31 of the current draft are inadequate.

Thank you again for allowing me to comment, and thanks for the effort you and the drilling community have exerted in these negotiations.

Mike Piechowski, P.E.  
DEQ, State Office, Drinking Water Section

4/17/2007